

# Sills Cummis & Gross

A Professional Corporation

101 Park Avenue, 28th Floor  
New York, New York 10178

Tel: (212) 643-7000

Fax (212) 643-6500

Katherine M. Lieb  
Of Counsel  
Admitted In NY, NJ  
Direct Dial: 212-500-1580  
Email: [klieb@sillscummis.com](mailto:klieb@sillscummis.com)

The Legal Center  
One Riverfront Plaza  
Newark, NJ 07102  
Tel: (973) 643-7000  
Fax: (973) 643-6500

May 14, 2024

**By ECF**

Honorable Freda L. Wolfson, U.S.D.J.  
Lowenstein Sandler LLP  
One Lowenstein Drive  
Roseland, NJ 07068

**Re:   Discovery Update, dated February 15, 2024;  
      *Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC*,  
      Civil Action No. 22-2632 (JKS) (CLW)**

Dear Judge Wolfson:

On behalf of Johnson & Johnson Health Care Systems Inc. (“JJHCS”), we write pursuant to the Court’s directives from the April 8, 2024 conference and April 10, 2024 email to electronically file discovery applications that were previously submitted via email. In accordance with that directive, we are herein electronically filing JJHCS’s letter providing an update on the discovery issues addressed at the January 24, 2024 conference, dated February 15, 2024. Per the parties’ agreement, we are filing these papers under temporary seal pending the filing of any related motions to seal.

Respectfully submitted,

/s/ Katherine M. Lieb

Katherine M. Lieb

cc: All counsel of record